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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

IBUUMERANG, LLC. a Texas Limited  
Liability Company

Plaintiff,

vs.

Case No. 2:21-cv-01611-JCM-VCF

Judge: Hon. James C. Mahan  
Magistrate Judge: Cam Ferenbach

T1 PAYMENTS LLC, a Nevada limited liability company; T1 PAYMENTS LIMITED, a United Kingdom private limited company; TGLOBAL SERVICES LIMITED, a United Kingdom private limited company; DONALD KASDON, an individual; DEBRA KAREN KING aka DEBRA KAREN KASDON, an individual; AMBER FAIRCHILD, an individual; PAYVISION B.V., a Netherlands limited company; Pixxles, Ltd., a United Kingdom private limited company

Defendants.

**STIPULATION TO CONTINUE  
DEADLINE TO FILE JOINT  
DISCOVERY PLAN AND  
SCHEDULING ORDER**

For good cause shown below, and pursuant to Local Rules 7-1, Plaintiff, Ibuumerang, LLC, and Defendants T1 Payments, LLC, T1 Payments Limited, TGlobal Services Ltd., Pixxles Ltd. (specially appearing), Donald Kasdon, Amber Fairchild, Debra King and PAYVISION B.V. submit this stipulation to continue the deadline to file the joint discovery plan and scheduling order deadline.

1. The Court's present Order requires that the Joint Discovery Plan and Scheduling Order be filed by March 7, 2022; and

2. This matter concerns multiple parties, including parties residing outside of Nevada, as a result two of the parties (Payvision B.V. and Pixxles, Ltd.) have challenged the jurisdiction of this Court pursuant to Rule 12(b)2. The Court has not yet ruled on these jurisdictional motions.

3. In addition, all of the defendants have pending Rule 12(b)6 motions which the Court has not yet ruled on.

4. Because of the jurisdictional issues, some of the defendants have indicated that they cannot participate in a Rule 26 conference as this may waive their jurisdictional defenses. As a result, the Parties have not yet been able to conduct a Rule 26 conference.

1 5. In addition, the parties have been discussing settlement and a global mediation is presently set  
2 for June 1, 2022, in Las Vegas with Judge Pro (Retired).

3 6. The parties have not previously requested a continuance to the filing of the Joint Discovery  
4 Plan and Discovery Order, and no prejudice will result to any party from a short continuance.

5 THEREFORE, the Parties hereby stipulated as follows:

6  
7 A. That the Joint Discovery Plan and Scheduling Order deadline be continued from March 7,  
8 2022 to April 6, 2022.

9 B. That by entering into this stipulation no defendant is waiving any right to contest the  
10 personal jurisdiction of this Court, and that Payvision and Pixxles do not consent to  
11 personal jurisdiction for purposes of this or any other litigation pending in Nevada.  
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13  
14 DATED: March 4, 2022

**SLIGHTING LAW**

15  
16 By: /s/ Bradley S. Slighting  
17 Bradley S. Slighting, Esq.  
18 Plaintiff, Ibuumerang, Inc.

19 DATED: March 4, 2022

**WELLMAN & WARREN**

20  
21 By: /s/ Scott Wellman  
22 Scott Wellman, Esq.  
23 Plaintiff, Ibuumerang, Inc.

24 DATED: March 4, 2022

**VENABLE LLP**

25 By: /s/ Ari N. Rothman  
26 Ari N. Rothman, Esq.  
27 Defendants, T1 Payments, LLC, Pixxles LTD  
28 (specially appearing),  
Donald Kasdon, Amber Fairchild and Debra King

1  
2 DATED: March 4, 2022

**McDONALD CARANO LLP**

3  
4 By: /s/ Aaron D. Shipley  
5 Aaron D. Shipley, Esq.  
6 Defendants, T1 Payments, LLC, Pixxles LTD  
7 (specially appearing)  
Donald Kasdon, Amber Fairchild and Debra King

8 DATED: March 4, 2022

**GIBBS GIDEN LOCHER TUNER  
SENET & WITTBRODT LLP**

9  
10 By: /s/ Richard E. Haskin  
11 Richard E. Haskin, Esq.  
12 Defendant, PAYVISION B.V.

13 DATED: March 4, 2022

**MUSICK, PEELER & GARRETT LLP**

14  
15 By: /s/ Peter J. Diedrich  
16 Peter J. Diedrich, Esq.  
17 Defendant, PAYVISION B.V.

**CERTIFICATE OF SERVICE**

I hereby certify, under penalty of perjury, under the laws of the United States of America that on this date, I caused to be electronically filed the foregoing document, and this Certificate of ECF Filing & Service, with the Clerk of the Court using the CM/ECF system, who will send notification of such filing to the following party:

**Attorneys for Defendants**

ARI N. ROTHMAN, VENABLE LLP; [anrothman@venable.com](mailto:anrothman@venable.com)

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Nathan D. O'Malley, Peter J. Diedrich, Giorgio A. Sassine, MUSICK, PEELER & GARRETT LLP

Attorneys for PayVision B.V., a Netherlands Limited Company.

DATED this 4th day of March 2022, at Laguna Hills, California.

/s/ Kelsey Schafer

Paralegal

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Attorneys for Plaintiff,  
IBUUMERANG, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

IBUUMERANG, LLC, a Texas Limited  
Liability Company

Plaintiff,

vs.

T1 PAYMENTS LLC, a Nevada limited  
liability company; T1 PAYMENTS  
LIMITED, a United Kingdom private limited  
company; TGLOBAL SERVICES LIMITED,  
a United Kingdom private limited company;  
DONALD KASDON, an individual; DEBRA  
KAREN KING aka DEBRA KAREN  
KASDON, an individual; AMBER  
FAIRCHILD, an individual; PAYVISION  
B.V., a Netherlands limited company;  
Pixxles, Ltd., a United Kingdom private  
limited company

Defendants.

Case No. 2:21-cv-01611-JCM-VCF

Judge: Hon. James C. Mahan  
Magistrate Judge: Cam Ferenbach

~~[PROPOSED]~~ ORDER RE:  
STIPULATION TO CONTINUE  
DEADLINE TO FILE JOINT  
DISCOVERY PLAN AND  
SCHEDULING ORDER

1 For Good Cause shown, the Court hereby orders that the deadline to file the Joint Discovery  
2 Plan and Scheduling Order is hereby continued from March 7, 2022 to April 6, 2022.

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4 **SO, ORDERED:**

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6 Date: 3-4-2022



7 Cam Ferenbach  
8 United States Magistrate Judge  
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